

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

*Caption in Compliance with D.N.J. LBR 9004-1(b)*

SAUL EWING LLP

Mark Minuti, Esquire (*pro hac vice* pending)

Turner N. Falk, Esquire

Centre Square West

1500 Market Street, 38th Floor

Philadelphia, PA 19102-2186

Office: (215) 972-7777

Fax: (215) 972-7725

mark.minuti@saul.com

turner.falk@saul.com

*Counsel for Loja WTP, LLC*

In re:

BED BATH & BEYOND INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

Jointly Administered

**APPLICATION FOR ADMISSION PRO HAC VICE**

Turner N. Falk, Esq. (“**Movant**”), a member in good standing of the Bar of the State of New Jersey and an attorney admitted to practice before the United States District Court for the District of New Jersey, and an associate with Saul Ewing LLP, hereby moves the Court for an order permitting Mark Minuti to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey to represent interested party Loja WTP, LLC (“**Loja**”) in the instant matter pursuant to Local Bankruptcy Rule 9010-1. In support of the relief requested herein, Movant states as follows:

<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

## **JURISDICTION**

This Court has jurisdiction to consider this application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this application is a core proceeding pursuant to 28 U.S.C. §157(b). Venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

## **RELIEF REQUESTED**

By this application, the Movant requests entry of an Order admitting *pro hac vice*, Mark Minuti (the “**Applicant**”). The good standing of the Applicant is set forth in the Applicant’s certification which is submitted herewith (the “**Certification**”).

Applicant is a partner with Saul Ewing LLP, and maintains offices at 1201 N. Market Street, Suite 2300, Wilmington, DE 19899. As the Certification demonstrates, Applicant is a member in good standing of the Bar of the highest court in which he is admitted.

It is anticipated that Applicant will be active in the representation of Loja in this case. Accordingly, the Movant respectfully requests that the Court grant the *pro hac vice* admission of Mark Minuti and that he be permitted to appear on Loja’s behalf in connection with this case.

No previous application for the relief sought herein has been made to this or any other court in connection with this proceeding.

**WAIVER OF MEMORANDUM OF LAW**

Pursuant to Local Rule 9013-1, Movant respectfully requests that the Court waive the requirement that it file a memorandum of law in support of this Application. Movant respectfully submits that no memorandum of law is necessary because no novel issues of law are presented herein.

Respectfully submitted,

Dated: May 23, 2023

SAUL EWING LLP

*/s/ Turner N. Falk*

Mark Minuti (*pro hac vice* pending)  
Turner N. Falk, Esquire  
Centre Square West  
1500 Market Street, 38th Floor  
Philadelphia, PA 19102-2186  
Office: (215) 972-7777  
Fax: (215) 972-7725  
mark.minuti@saul.com  
turner.falk@saul.com  
*Attorneys for Loja WTP, LLC*